

EXHIBIT D

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February 14, 2008

VIA FACSIMILE & FIRST CLASS MAIL

Alisa B. Arnoff, Esq.
Scalambrino & Arnoff, LLP
1 North LaSalle Street, Suite 1600
Chicago, Illinois 60602

RE: Ida Tucker v. Whelan Security Company, et. al.

Dear Ms. Arnoff:

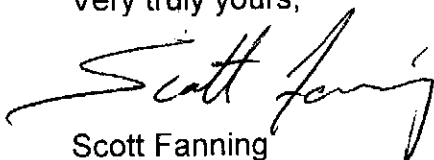
After reviewing Defendants' responses to Ida Tucker's first set of requests to admit facts directed at Whelan Security Company and Whelan Security of Illinois, Inc. we have determined that many of the Defendants' denials are improper and insufficient – Whelan Security Company's denials to requests to admit numbers 1-5, 10-12, 24-25, 27, 31-32, and 34-35 and Whelan Security of Illinois' denials to requests to admit numbers 1-5, 10-12, 24-25, 27, 31-32, and 34-35.

Prior to each denial of these requests, both Defendants state that "after making reasonable inquiry, the information that [Defendant] knows, or it can readily obtain, is insufficient to enable it to admit or deny" the request. On each occasion, both Defendants proceed to deny each request.

A denial is improper here as Defendants have both admitted that they do not have sufficient information to deny the request. FRCP 36(a)(4) requires that a party responding to a request to admit "must specifically deny it or state in detail why the answering party cannot truthfully admit or deny it." In this case, Defendants are attempting to do both, which is inconsistent with plain language of the rule.

As such, I ask that you revise your responses to Plaintiff's first set of requests to admit. If Defendants do not have sufficient information to truthfully admit or deny any request to admit, comply with Rule 36(a)(4) and do not admit or deny the request.

Very truly yours,


Scott Fanning